



CORNERSTONE

Environmental Group, LLC

90 Crystal Run Road, Suite 201 • Middletown, NY 10941 • (877) 294-9070 • Fax: (845) 692-5894

VIA E-MAIL AND US MAIL

February 7, 2013

Mr. Jonathan Gorin
Remedial Project Manager
United States Environmental Protection Agency, Region II
290 Broadway
19th Floor
New York, New York 10007-1866

Subject: Monthly Progress Report for January 2013
LCP Chemicals, Inc. Superfund Site (USEPA ID# NJD079303020)

RECEIVED
FEB 12 2013

Dear Mr. Gorin:

The following monthly progress report is submitted on behalf of ISP Environmental Services Inc. (IES) in satisfaction of the Section VIII.35 requirements of Administrative Order No. II CERCLA-02-99-2015 (hereinafter referred to as the Order) issued by USEPA and as executed by IES on May 13, 1999.

A "Gantt Chart" project schedule is provided as an attachment (Figure 1). This project schedule provides graphical representations of the project tasks and subtasks. Accordingly, the project schedule depicts the task completion through the end of the reporting month and provides an estimate of the timing of future tasks.

1. Previous Actions in Compliance with the Order

A. The following actions have been taken to comply with the Order during the previous month:

- Continued coordination with the USEPA on resolving comments on the *Draft Remedial Investigation Report (RIR)*, which is pending final input from the USEPA.
- Continued coordination with the USEPA on resolving comments on the *Draft Baseline Ecological Risk Assessment* (Appendix Q to the RIR), based on final comments received from the Agency in a letter dated January 16, 2013.
- Continued coordination with the USEPA on final resolution of comments on the *Draft Feasibility Study (FS)*, which is also pending final input from the USEPA.
- Participated in a conference call on January 28, 2013, with Jon Gorin and Frank Cardiello of the USEPA to discuss site progress and additional responsible parties.
- Received an email from Jon Gorin of the USEPA; on January 9, 2013, informing ISP that an above ground tank believed to be from LCP moved during Hurricane Sandy onto the adjacent Phillips 66 property. A visit to the Phillips 66 property by an IES representative occurred confirming that the tank was from the LCP site. Work continues to properly dispose of the tank.

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- B. The following documents were submitted to the agencies during the previous month:
- Monthly progress letter report dated January 3, 2013, including an updated project schedule dated January 2, 2013.
- C. The following agency approvals were received during the previous month:
- None during the reporting period.
- D. The following agency documents and correspondences were received during the previous month:
- Letter from Carole Peterson of the USEPA, dated January 16, 2013, to John Hoffman of Ashland, transmitting final comments on the draft *Baseline Ecological Risk Assessment*.
- E. Other pertinent communications with the agencies during the previous month:
- None this period

2. Future Actions, Data, and Plans

- A. The following actions, data, and plans are scheduled to be conducted during the following two (2) months contingent on the USEPA's schedule for final input on previously submitted documents and responses to Agency comments:
- Follow up on the final response to comments from the USEPA on the *Draft Remedial Investigation Report* submitted by IES, and after confirmation that the comments have been resolved, begin preparation of the *Final Remedial Investigation Report*.
 - Address the final comments from the USEPA on the *Draft Baseline Ecological Risk Assessment* (BERA) submitted by IES, and prepare a final BERA.
 - Continue work on resolving comments from the USEPA on the *Draft Feasibility Study* report.
 - Continue work to properly dispose of the tank that moved during Hurricane Sandy.
- B. Other information related to the progress of work:
- None during this reporting period.

3. Project Schedule

- A. The percentage of completion of the project subtasks has been updated and is shown on the overall project schedule (Figure 1). Many of the schedule subtask details including the Phase I and Phase II RI field investigations and the treatability study determination process are 100% complete and have been collapsed for presentation brevity on Figure 1. With the submittal to the USEPA of the revised draft RI report and the draft FS report, the schedule is controlled by the USEPA review process. Coordination with the USEPA is ongoing regarding the review process.

Based on the current status of final input from the USEPA on the RI and the FS and previously submitted response to comments documents, with this progress report the schedule has been updated to provide an additional approximately two months to conclude the review process. As the time necessary to complete the review process is further defined, the schedule will be updated accordingly.

- B. Delays that have been encountered or anticipated that may affect the future schedule for completion of the work:
- No specific delays are being encountered at this time, and the current schedule reflects the completion of draft RI and FS reports, as described above. However, resolution of comments is pending on the revised RI and draft FS.
- C. Description of efforts made to mitigate these delays or anticipated delays:
- None necessary at this time.

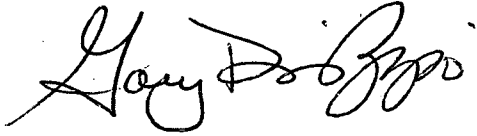
4. Funding Mechanism

- A. An Irrevocable Letter of Credit No. P-224827, issued by JP Morgan Bank effective April 25, 2002, and associated Standby Trust Agreement were issued in satisfaction of the financial assurance obligations of the Order as documented to USEPA in a letter from Celeste Wills, Esq. of IES, dated April 26, 2002.

If you or your staff has any questions or comments, please do not hesitate to contact John Hoffman of Ashland Inc. at 302-995-3485.

Sincerely,

CORNERSTONE ENVIRONMENTAL GROUP, LLC

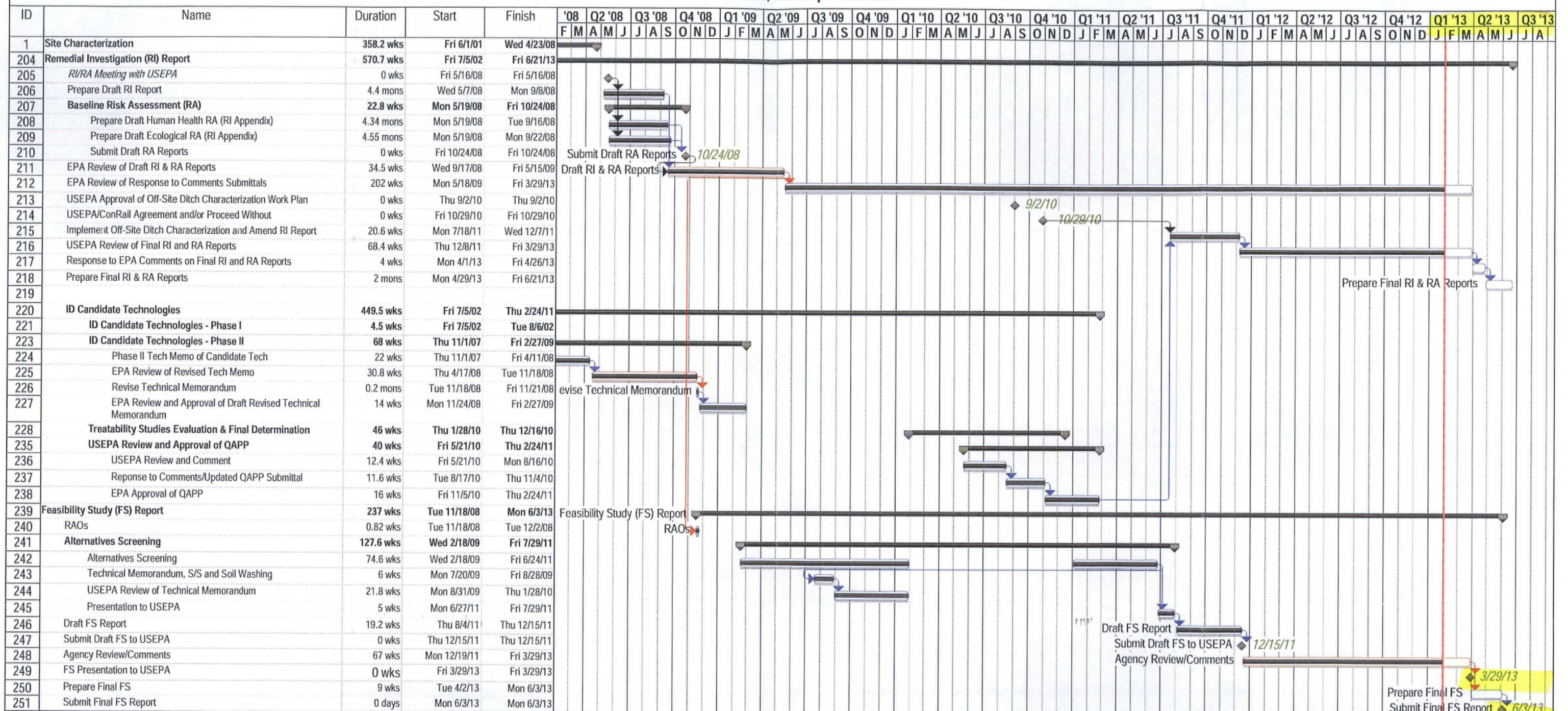


Gary J. DiPippo, P.E.
Manager, Hydrogeology and Remediation

Enclosure

cc: J. Hoffman, Ashland Inc.	C. McGowan, IES
S. Miller, NJDHSS	S. MacMillin, Brown and Caldwell
F. Cardiello, Esq., USEPA	K. Tolson, Geosyntec
D. Toft, Esq.	M. DeFlaun, Geosyntec
A. Pavelka, NJDEP	J. Kubitz, Entrix
R. Lampkin, Ashland	

Figure 1
RI/FS PROJECT SCHEDULE
LCP Chemicals, Inc. Superfund Site



Task  Progress  Milestone  Summary 



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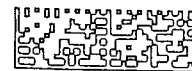
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Mr. Frank Cardiello
USEPA, Region II
290 Broadway
New York, NY 10007-1866

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